

UNITED STATES BANKRUPTCY COURT
For the
DISTRICT OF MASSACHUSETTS

In Re:

Katie Knectel
Debtor

Chapter 13
Docket No. 17-30204

MOTION FOR CONTINUATION OF THE AUTOMATIC STAY AND
REQUEST FOR HEARING WITHIN 30 DAYS

NOW COMES Katie Knectel, Debtor in the above-captioned matter, and respectfully moves the Court pursuant to 11 U.S.C. § 362 (c)(3)(B) for an order continuing the Automatic Stay provided under 11 U.S.C. §362(a) as to all creditors. Debtor also requests a hearing date set before the expiration of the thirty (30) day Stay. In support of her Motion, the Debtor states as follows:

1. The Debtor commenced this case on March 24, 2017, by filing a Voluntary Petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. The Debtor's previously filed Chapter 13 case which was dismissed on September 9, 2016.
3. The petition in this case has been filed in good faith. The Debtor was unable to complete her previous plan due to lack income. Debtor voluntarily dismissed her plan. Since that time, the Debtor has obtained a second job and her income has stabilized. Debtor feels that this Chapter 13 Plan will be confirmed and that she will be able to fully perform under the terms of her Plan.
4. The Debtor's prior Dismissed Chapter 13 case was the only case filed by the Debtor and pending during the preceding year.

5. Pursuant to 11 U.S.C. §109(g) the case was not dismissed because the Debtor willfully failed to file or amend their petition or any required documents, or to provide adequate protection ordered by the Court.
6. Pursuant to 11 U.S.C. §109(g) the case was not willfully dismissed by the Debtor following the filing of a Motion for Relief

WHEREFORE, the Debtor prays:

- A. That this Court continues the Automatic Stay under 11 U.S. C. § 362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under 11 U.S.C. § 362(c) (1) or (c) (2), or a Motion for Relief is granted under 11 U.S.C. § 362(d).
- B. That the Court set a Hearing on this matter within the thirty (30) day period.

Dated: March 24, 2017

Respectfully submitted,

/s/ Katie Knectel

By her Attorney
/s/ Paul A. LaRoche, Esq.
Paul A. LaRoche, Esq.
P. O. Box 504
Gardner, Massachusetts 01440
BBO #560487

Telephone: (978) 632-1633

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the Debtor's Motion to Continue the Stay and Affidavit of Debtor that was filed with this Court was this day served upon the parties listed below electronically and/or by first class mail.

SIGNED under the pains and penalties of perjury.

March 24, 2017

/s/ Paul A. LaRoche, Esq.
Paul A. LaRoche
Attorney for Debtor
LaRoche Law
P.O. Box 504
338 Elm Street
Gardner, MA 01440
978-632-1633

Via ECF:

Richard King
Office of the US Trustee

Denise Pappalardo, Esq.
Chapter 13 Trustee

All ECF Participants

Via first class mail to the creditors listed on the attached Creditor Matrix.